

## **Exhibit 15**

3

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF NEW YORK  
-----X  
3 TZVI WEISS, et al.,  
4 Plaintiffs,  
5 -against-  
6 NATIONAL WESTMINSTER BANK, PLC,  
7 Defendant.  
-----X  
8 NATAN APPLEBAUM, et al.,  
9 Plaintiffs,  
10 -against-  
11 NATIONAL WESTMINSTER BANK, PLC,  
12 Defendant.  
-----X  
13  
14 \* HIGHLY CONFIDENTIAL \*  
15  
16  
17 VIDEOTAPED DEPOSITION OF IAN WICKENS,  
18 taken before Cheryl Kerr, a Notary Public  
19 and a Shorthand Reporter, held at the offices  
20 of Cleary, Gottlieb, Steen & Hamilton, LLP,  
21 located at 55 Basinghall Street, London,  
22 England on Monday, the 23rd day of June,  
23 2008, at 9:36 a.m.  
24  
25

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Also Present: Jackie Sheftali, NatWest;  
Simon Rutson, Videographer  
21  
22 \*\*\*\*\*  
23  
24  
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1 compartments.  
2 Sometimes the nature of the untoward  
3 activity would jump out at you from the  
4 page and it was blindingly obvious what we  
5 were looking at, but that was rare. Most  
6 of the time you are looking at a pattern  
7 of activity that is not consistent or a  
8 particular transaction, which is out of  
9 kilter from what is expected from that  
10 customer.  
11 That is the key principle which  
12 governs the suspicion reports. This is  
13 not what you expect from that customer.  
14 You may have no clue whatsoever of what  
15 the underlying untoward activity is, if  
16 any. Lot of time it's just trying to  
17 conceal monies from the tax man or  
18 something when we are looking at the cash  
19 runs.  
20 So you know, we didn't try to  
21 pigeonhole things to say oh, this is a  
22 terrorist one, so we must do this, that  
23 and the other. I mean, we did have quite  
24 a lot of reports particularly after Irish  
25 atrocities, which tended to raise

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1 awareness again of IRA activity, and where  
2 we get all sorts of defensive reports from  
3 people simply because they are Irish,  
4 basically.  
5 It was very difficult for us not to  
6 report anything which carried a specific  
7 terrorist tag, if it was identified in the  
8 report, but very often the quality of  
9 those reports was not good. But simply  
10 because we would never have wanted to not  
11 report something which could have had a  
12 terrorist connection, I am afraid an awful  
13 lot of very perfectly innocent Irish  
14 people got reported simply because a  
15 member of staff had -- had developed a  
16 concern really for no better reason than  
17 that they were Irish and that -- you know,  
18 had a bit of money or something. But --  
19 so it could be quite crude at times.  
20 MR. L. FRIEDMAN: Mark, when it's a  
21 convenient time, can we break?  
22 MR. WERNER: Let me ask one  
23 question, and I will be happy to break, if  
24 that's okay.  
25 THE WITNESS: Yeah.

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1 BY MR. WERNER:  
2 Q. Would it be fair to say that there was  
3 somewhat inherently of a partnership in NatWest  
4 between the people who had the account relationships  
5 with the customers and with the -- with the fraud  
6 and the anti-money laundering group?  
7 MR. L. FRIEDMAN: Object to the form.  
8 THE WITNESS: Wait. Partnership, not  
9 quite sure that's the word I would use,  
10 but yes, clearly we wanted to foster open  
11 dialogue. We were working hard -- you  
12 know, to build up the culture of awareness  
13 to ensure that people knew what they had  
14 to do, that they were quick to pick the  
15 phone up, that they were very welcome to  
16 pick the phone up if they wanted to talk  
17 about things before they submitted a  
18 written report. You know, we were there  
19 to -- to help, so yes, I suppose in that  
20 sense, partnership is a perfectly good  
21 word, yes.  
22 BY MR. WERNER:  
23 Q. Did your group ever initiate  
24 investigations to try to determine if there was  
25 money laundering or -- or terror financing without

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1 having first gotten a -- a suspicion report?  
2 A. Oh, yes.  
3 MR. L. FRIEDMAN: Object to the form.  
4 THE WITNESS: Information,  
5 intelligence, if you like, would come to a  
6 department like ours from various sources.  
7 You might get a tipoff from another bank.  
8 You might get a word to the wise from, you  
9 know, a law enforcement officer. You  
10 might see something in a newspaper. You  
11 know, there could be various things which  
12 would trigger you to start digging  
13 proactively (indicating) from the center  
14 outwards, rather than receiving  
15 information inwards.  
16 No, we were not limited in our  
17 activity to purely what was -- what was  
18 obtained from incoming suspicion reports.  
19 BY MR. WERNER:  
20 Q. Well, I definitely want to pick up there  
21 when we come back from the break. Can you say  
22 during your tenure, though, before the break, in  
23 general terms, was it 50/50, or 80/20? I mean,  
24 the -- the magnitude of investigating because of the  
25 receipt from an employee of a suspicious activity